

GOLDSTEIN & RUSSELL, P.C.

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October 16, 2021

**Via CM/ECF**

Hon. Lorna G. Schofield  
United States District Court  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: 21-cv-6044-LGS, *Border v. Habib Bank Limited*, Request for Adjournment of  
Initial Case Management Conference

Dear Judge Schofield,

I represent the plaintiffs in this action and write to respectfully move, pursuant to your honor's Individual Rule of Practice I.B.2, for an adjournment of the initial case management conference currently scheduled for October 28, 2021, at 10:50 AM. This is the first request for adjournment. An adjournment is warranted because, as with the related cases, 20-cv-4322-LGS, *King v. Habib Bank Limited*, and 21-cv-2351-LGS, *Alexander v. Habib Bank Limited*, service has not yet been completed pursuant to the Hague Convention on the Service Abroad of Judicial or Extrajudicial Documents in Civil or Commercial Matters. We are following the same procedure in this case, and encountering the same delays.

In *King*, the Court entered an order on September 16, 2020, adjourning the initial case management conference *sine die*, and requiring us to provide notice every 30 days of the status of attempts to effect service, or within 2 days if service was completed, or the defendant otherwise made contact. I respectfully request that a similar order be entered in this case, because the process for perfecting service (or otherwise obtaining a response) will be identical here. If the Court is agreeable, I recommend that letters updating the Court be filed in both cases on the same schedule.

Respectfully submitted,

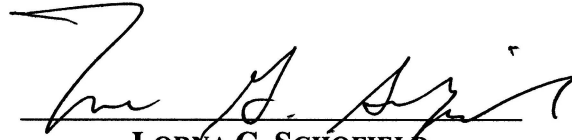
s/Tejinder Singh

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Plaintiffs' application is **GRANTED**. The initial pretrial conference scheduled for October 28, 2021, is **adjourned sine die**. Plaintiffs shall file a status letter on service and communication efforts by **November 15, 2021**, and every 30 days thereafter. If service is completed or Plaintiffs are in communication with Defendant in between status letter deadlines, Plaintiffs shall file a status letter within two business days of the event.

Dated: October 18, 2021  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE